

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF TEXAS
3 CORPUS CHRISTI DIVISION

4 MARC VEASEY, JANE HAMILTON,)
5 SERGIO DELEON, FLOYD J. CARRIER,)
6 ANNA BURNS, MICHAEL MONTEZ,)
7 PENNY POPE, OSCAR ORTIZ, KOBY)
8 OZIAS, JOHN MELLOR-CRUMMEY,)
9 JANE DOE, JOHN DOE, LEAGUE OF) CIVIL ACTION NO.
10 UNITED LATIN AMERICAN CITIZENS) 2:13-CV-193 (NGR)
11 (LULAC), AND DALLAS COUNTY,) (lead case)
12 TEXAS)
13)
14)

15 VS.)
16)
17 RICK PERRY, Governor of Texas,)
18 and JOHN STEEN, Texas Secretary)
19 of State,)
20)

21)
22 UNITED STATES OF AMERICA,)
23)

24 V.)
25)
26 STATE OF TEXAS, JOHN STEEN, in) CIVIL ACTION NO.
27 his official capacity as Texas) 2:13-CV-263 (NGR)
28 Secretary of State, and STEVE) (consolidated case)
29 MCCRAW, in his official capacity)
30 as Director of the Texas)
31 Department of Public Safety,)
32)

33)
34 TEXAS STATE CONFERENCE OF NACCP)
35 BRANCHES, AND THE MEXICAN)
36 AMERICAN LEGISLATIVE CAUCUS OF)
37 THE TEXAS HOUSE OF)
38 REPRESENTATIVES,)
39)
40 V.) CIVIL ACTION NO.
41) 2:13-CV-291 (NGR)
42 JOHN STEEN, in his official) (consolidated case)
43 capacity as Texas Secretary of)
44 State, and STEVE MCCRAW, in his)
45 official capacity as Director of)
46 the Texas Department of Public)
47 Safety)

1 *****

2 ORAL DEPOSITION OF

3 J.R. HARRIS

4 JUNE 17, 2014

5 *****

6

7 ORAL DEPOSITION of J.R. HARRIS, produced as a
8 witness at the instance of the Plaintiffs, was taken in
9 the above-styled and numbered cause on JUNE 17, 2014,
10 from 2:41 p.m. to 3:42 p.m., before Cynthia C. Miller,
11 CSR in and for the State of Texas, reported by machine
12 shorthand, at the Office of Vince Ryan, County Attorney,
13 1019 Congress, 15th Floor, Houston, Texas, pursuant to
14 the Federal Rules of Civil Procedure and the following
15 stipulation and waiver of counsel:

16 IT WAS STIPULATED AND AGREED by and between
17 counsel that if the original of said deposition is not
18 signed or available at the time of trial or any hearing,
19 an unsigned copy may be used in lieu thereof.

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2
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APPEARANCES

4
5

FOR THE PLAINTIFFS:

6
7
8
9

Mr. Chad W. Dunn
BRAZIL & DUNN
4201 Cypress Creek Pkwy, Suite 530
Houston, Texas 77068
281-580-6310
281-580-6362 (fax)

10

FOR THE PLAINTIFF UNITED STATES OF AMERICA:

11

Ms. Angela Miller (via telephone)
DEPARTMENT OF JUSTICE
Civil Rights Division
950 Pennsylvania Avenue N.W. (NWB-7200)
Washington, D.C. 20530
202-514-2919
202-307-3961 (fax)

12
13
14
15

16 FOR THE DEFENDANTS STATE OF TEXAS,
RICK PERRY, JOHN STEEN, AND STEVE McCRAW:

17

Mr. John B. Scott
DEPUTY ATTORNEY GENERAL FOR LITIGATION
Southern District of Texas No. 10418
209 West 14th Street
Austin, Texas 78701
512-475-0131
512-475-2994 (fax)

21
22
23
24
25

1 APPEARANCES CONTINUED
2

3 FOR THE DEPONENT:

4 Mr. Douglas P. Ray
5 SENIOR ASSISTANT COUNTY ATTORNEY
6 1019 Congress, 15th Floor
7 Houston, Texas 77002
8 713-274-5463
9 713-755-8772 (fax)

10 Ms. Sonya Aston
11 HARRIS COUNTY CLERK'S OFFICE
12 Administrator of Elections
13 1001 Preston, 4th Floor
14 Houston, Texas 77002
15 713-755-5792
16 713-755-2617 (fax)

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J.R. HARRIS,

EXAMINATION

BY MR. DUNN:

Q. Please tell us your name.

A. My name is James Rice Harris. I go by J.R.

Q. All right, Mr. Harris. My name is Chad Dunn.

We've had the occasion to meet a few times; is that right?

A. Yes.

Q. All right. I represent a group of plaintiffs called the Veasey/LULAC plaintiffs, also includes Dallas County as plaintiffs in this case. Do you understand that?

A. Yes.

Q. I notice you're writing down some things, and you're certainly free to do that. Just understand, if you write down something on that notebook, somebody in this room might ask you to look at it, and they are entitled to do so.

A. Sure.

Q. Have you ever given a deposition before?

A. Yes.

Q. Okay. About how many occasions?

A. I believe only once.

1 Q. And I understand you're a lawyer; is that
2 right?

3 A. Yes.

4 Q. Did you take depositions at any point in your
5 career?

6 A. I don't believe I have.

7 Q. Okay. What was the occasion you gave a
8 deposition?

9 A. It was in my capacity as an assistant county
10 attorney representing the appraisal review board.

11 Q. I see. So I assume it had nothing to do with
12 voting.

13 A. Nothing to do with voting.

14 Q. Okay. How long ago was that?

15 A. Probably three years ago.

16 Q. All right. You might basically understand a
17 deposition, but it's important we don't talk over one
18 another because the court reporter can only take down
19 one voice at a time, all right?

20 A. (Witness nodded.)

21 Q. If you answer audibly, or shake of a head like
22 you just did, I'll ask you if that's a "yes" or "no."
23 That's because the court reporter can't take down
24 gestures. Do you understand?

25 A. Yes.

1 Q. You can take a break if you need to, if you
2 have any questions, that will be fine, but I don't
3 expect it to take an hour or so. And then each of these
4 other lawyers may avail themselves of the opportunity of
5 asking you some questions. Okay?

6 A. Yes.

7 Q. First, give us the benefit of where you were
8 born, grew up, went to school, that sort of thing.

9 A. Okay. Born and raised in Houston. Went to
10 college at University of Texas at Austin. Went to law
11 school at South Texas College of Law. Graduated in
12 2005.

13 Came to work for the assistant -- the
14 county attorney's office here in Harris County. Was
15 employed with the county attorney's office up until
16 about a year ago. And now I'm the director of
17 compliance at the tax office.

18 Q. Okay. When did you start as director of
19 compliance?

20 A. This would have been maybe April of 2013.

21 Q. Okay. When you were at the county attorney's
22 office, did you have any responsibilities as they
23 pertain to elections?

24 A. No, other than occasionally helping out on
25 election day. That was mainly Doug Ray's

1 responsibilities.

2 Q. How would you help on election day?

3 A. Answer calls, any calls that were referred to
4 the county attorney's office that day.

5 Q. Okay. Did somebody recruit you to go work for
6 the tax office?

7 A. No.

8 Q. Okay. Was it a posting that you applied for?
9 How did you become employed over there?

10 A. I had always thought that they needed a
11 director of compliance, and they had had one off and on.
12 Mr. Sullivan (sic) was the new tax assessor-collector.

13 Mr. Sullivan, the previous tax
14 assessor-collector, did not have an director of
15 compliance. And I just thought it would be a good fit.
16 I wanted to be more hands-on and be able to actually be
17 more involved in the day-to-day activities.

18 Q. You said Mr. Sullivan twice, you mean
19 Mr. Vasquez didn't have a compliance --

20 A. Mr. Sumner.

21 Q. Sumner.

22 A. I may have misspoke, Mr. Sumner.

23 Q. Okay. Perhaps I misheard you. So Mr. Sumner
24 didn't have a director of compliance, you thought it
25 would be a good idea if Mr. Sullivan, the current

1 officeholder, would?

2 A. Yes.

3 Q. And you volunteered to do that; is that right?

4 A. Yes.

5 Q. Okay. And so you transferred your Harris
6 County employment from the county attorney's office to
7 the tax assessor's office?

8 A. Yes.

9 Q. So what does the director of compliance do on
10 a day-to-day basis?

11 A. Okay. Well, I am directly over the voter
12 department, so I do interact with the voter department
13 daily. I also handle open records requests and help
14 oversee and manage our responses to the many open
15 records requests we receive.

16 I also help deal with any litigation that
17 may be foreseeable. If we have threats of litigation,
18 I'll step in and deal with the corresponding director of
19 property tax or auto and try to resolve the issues, try
20 to prevent any litigation, if possible.

21 And also help work with the county
22 attorney's office if we're -- we do have some active
23 litigation. Get them the answers they need to
24 questions. Or any information they need. And may
25 suggest a course of action to take in the litigation.

1 Q. All right. Prior to your employment at the
2 tax office, did you ever -- have you ever testified
3 before the legislature?

4 A. No, I have not.

5 Q. Have you ever worked for a member of the
6 legislature?

7 A. No.

8 Q. Have you been involved in electoral campaigns
9 at all?

10 A. Yes.

11 Q. Which campaigns did you work on?

12 A. I went door-to-door for Anne Clutterbuck.

13 This was many, many years ago when she first ran for
14 City Council.

15 I may have stood out at an election poll
16 for Vince Ryan. I think that's the extent of it.

17 Q. Okay.

18 A. Very nominal volunteer-type stuff.

19 Q. Give us a sense of sort of who you report to
20 in Mr. Sullivan's office.

21 A. Okay.

22 Q. An organization chart type thing.

23 A. Sure. I report to Mr. Sullivan directly.

24 Q. Okay. Are you considered a supervisor of the
25 department that handles voter registration?

1 A. I'm considered a director who oversees the
2 voter department.

3 Q. All right. So I guess maybe I'll just start
4 by an example. Let's say one of the clerks who
5 processes voter registration needs to be, you know, let
6 go. Do you make that decision or handle that?

7 A. Yes, sure. Ultimately, it's Mr. Sullivan who
8 would hire or terminate someone, but I would be involved
9 in that process, yes.

10 Q. Okay. If a clerk working on voter
11 registration applications had a question or a concern,
12 are you their next level supervisor? Is there somebody
13 in between?

14 A. Sure. There is a few layers in between.

15 Q. Okay.

16 A. We have two assistant managers, and we have a
17 manager of voters.

18 Q. And who are those three people?

19 A. Albert Cheng, C-H-E-N-G, is the manager of
20 voters. And Sue Hastings is an assistant manager. And
21 Cosme Garcia is an assistant manager.

22 Q. And I want to back up and do something I
23 should have done before. Just because the court may
24 ultimately review your deposition, not see you in
25 person, can you give us your age and race?

1 A. Sure. I am --

2 Q. "Ish" on the age.

3 A. Thirty-six years old. And I am Caucasian.

4 Q. All right. So now I want to talk about

5 Senate Bill 14. And when I mention that, I'm talking

6 about the photo identification bill the legislature

7 passed in 2011 --

8 A. Yes.

9 Q. -- that was implemented in Texas starting in

10 June of 2013.

11 A. Okay.

12 Q. So do we have an understanding of what we're

13 talking about when we say Senate Bill 14?

14 A. Yes.

15 Q. When is it you first became involved in Senate

16 Bill 14?

17 A. As soon as the Shelby County case came out, I

18 believe the next day or even that day, the A.G. came out

19 with a release saying that S.B. 14 would now be in

20 effect. So from the beginning.

21 Q. Okay.

22 A. But not -- but I wasn't involved in the

23 original legislation or any aspect of that.

24 Q. So when you got -- you mentioned that the A.G.

25 put out -- or the state attorney general put out a

1 release. Was that something that you just received
2 through the media, or it was actually delivered to your
3 office?

4 A. Oh, probably a combination. If there was some
5 LISTSERV that I was on from the A.G.'s office, I
6 received it that way. But also I think simultaneously,
7 I heard about it through the media.

8 Q. Now, we've heard about earlier today a
9 LISTSERV that the Texas Association of Counties
10 administers.

11 A. Okay.

12 Q. Is that the LISTSERV that you're talking
13 about, or a different LISTSERV?

14 A. This would be maybe something from the
15 secretary of state to the election administrators or
16 officials.

17 Q. Okay. And I'm not technically trained enough
18 to know exactly what a LISTSERV is, but, you know, I can
19 understand you have like an e-mail blast list, and then
20 there's also kind of these lists where you have a more
21 fluid conversation, you post something and everybody can
22 read it, and then they can post something.

23 So do you know whether it was an e-mail
24 you got from the secretary of state to a larger list, or
25 was it on more of these LISTSERV-type systems?

1 A. Well, let's be clear, I don't recall if it was
2 directly from the A.G.

3 Q. Okay.

4 A. I may have heard about it from the media. But
5 if it was, it would have been a one-directional type
6 e-mail, not a fluid back and forth sort of list.

7 Q. Okay. There's -- are you a member of any
8 election-related LISTSERVs, that you know of?

9 A. Yes.

10 Q. What are those?

11 A. I cannot -- I don't know how they are
12 described, but it comes from the secretary of state.
13 Whenever they have a bulletin, I'll receive that
14 bulletin from the secretary of state.

15 Q. Okay. Any other kind of LISTSERVs?

16 A. Yes. TACA, I think is what you mentioned.

17 Q. Texas Association of Counties?

18 A. No, that's TAC.

19 Q. Okay.

20 A. There's a Texas Association -- Tax
21 Assessor-Collector Association, that's TACA.

22 Q. Okay.

23 A. I receive e-mails from that organization. I
24 occasionally receive e-mails from the Texas Department
25 of Licensing and Regulation. I receive lists -- I

1 receive commissioner court agendas, I'm on that list.

2 I'm on --

3 Q. I'm focusing on ones that are
4 election-related.

5 A. Sure. Mainly from the secretary of state.

6 Whatever lists they have of who would receive bulletins,
7 I'm on that list.

8 Q. Okay. But are you aware of any LISTSERV
9 that's election-related, in whole or in part, where --
10 you know, it's more like I described, where you can post
11 something, and other people can see it, and then they
12 can post in response?

13 A. No.

14 Q. Okay.

15 A. I don't -- and you mentioned TAC, which I
16 don't believe I'm a member of that LISTSERV.

17 Q. And that probably would have been a better way
18 for me to ask it. We talked to Mr. Stanart, and he said
19 he was on this LISTSERV for the Texas Association of
20 Counties. And I asked him if anybody in the tax office
21 was, and he said he wasn't sure. So that's what I'm
22 really trying to find out.

23 A. I'm not on the Association of Counties
24 LISTSERV.

25 Q. And do you know if anybody in the tax office

1 is?

2 A. I do not know.

3 Q. Okay.

4 A. I would assume Mr. Sullivan was, but I just
5 don't know.

6 Q. Now, do you know how it is that the tax
7 assessor-collector, as an officeholder, got involved in
8 doing voter registration?

9 A. You know, I want to speak with as much
10 personal knowledge as I have, and I've never seen any
11 primary indication of this, but, yes, I'm familiar in
12 the sense that I've heard that it was based on the poll
13 tax and collecting the tax associated with voting.

14 Q. But that's not anything you've gone back and
15 looked at sort of the legal authority behind it?

16 A. No, but I think that would be interesting. So
17 I can't verify that, I can't speak with any authority on
18 that.

19 Q. Sure.

20 A. But I think that's the consensus, if you were
21 to ask anybody as to why there's that connection.

22 Q. All right. So going back to S.B. 14, somehow
23 you get this notice from the state attorney general that
24 S.B. 14 is going to be implemented after Shelby County.
25 And what role, if any, did you have then going forward

1 in its implementation?

2 A. Okay. I oversaw how we were going to
3 implement the requirements.

4 Q. When you say "we," are you talking about --

5 A. The tax office, the tax voter registrar.

6 Q. Not the county as a whole?

7 A. Not the county as a whole.

8 Q. Okay.

9 A. Just the voter registrar's office.

10 Q. And so what did you do to determine what
11 implementation steps the tax office should take?

12 A. Okay. Well, we identified what role we played
13 in this process, and outlined a course as to how we can
14 successfully deal with this new procedure.

15 Q. Did you have a person or persons with the
16 county clerk that you liaised with?

17 A. Yes, we would meet occasionally with Sonya
18 Aston.

19 Q. Okay. Anybody else?

20 A. Occasionally, maybe Hector. I don't know his
21 last name.

22 MR. RAY: Deleon.

23 A. Deleon. Outreached with the county's office.

24 Q. (By Mr. Dunn) And you said "we." Was there
25 somebody else in your department that was involved in

1 these discussions?

2 A. Sure, it was a team effort.

3 Q. Who were they?

4 A. Albert Cheng, Cosme Garcia, Amanda Martin, who
5 is a project coordinator underneath me. Sue Hastings.
6 Jack Kasserman, who does imaging within our office.
7 Jennifer Dage, who is administrative assistant within
8 the office of the voter registrar department. Xavier
9 Herrera, who was our outreach manager. And Justin
10 Concepcion, who is our communication manager.

11 Q. Would you ever deal with anybody in the
12 secretary of state's office?

13 A. Yes. We would interact with Betsy -- last
14 name is hard to pronounce. Maybe Shernoff or something.
15 And Keith Ingram. And Ashley Fisher, an attorney with
16 the secretary of state's office.

17 Q. Anybody else you can think of in the secretary
18 of state's office?

19 A. Not by name.

20 Q. Was Ed Johnson at all involved in this
21 process?

22 A. Meaning the pure voter registration aspect of
23 it?

24 Q. The S.B. 14 implementation.

25 A. Well, involved in what? At all? What are you

1 asking if he was involved?

2 Q. In the process of implementing Senate Bill 14
3 in Harris County.

4 A. Within the voter registration department?

5 Q. Within the county at all, if you are aware.

6 A. Okay. Then there was just one instance I know
7 he was involved, and that was sending out a letter to
8 voters that related to S.B. 14.

9 Q. Okay.

10 A. But other than that, no, absolutely not. He
11 was not involved in our implementation.

12 Q. And within which office does Mr. Johnson work?

13 A. The county clerk's office.

14 Q. And what about George Hammerlein?

15 A. I can't think of any aspect where I dealt with
16 him on any issues. It may have bled over with whatever
17 letter Ed Johnson sent out, he may have been involved in
18 that as well.

19 Q. Mr. Hammerlein also works for the county
20 clerk?

21 A. Yes.

22 Q. Okay. All right. So what steps did the tax
23 office need to do to change their behavior in order to
24 deal with S.B. 14?

25 A. Well, the first step was to educate our office

1 on what it meant. We did not want any misinformation
2 out there, and we certainly didn't want it coming from
3 our office.

4 So we began by training the voter
5 registration department and anyone else who would
6 possibly deal with this issue, whether it's answering
7 phones on election day, or dealing with a customer in a
8 branch.

When I speak about our role, I generally mean the cure process. Where someone who voted provisionally can cure their vote through a variety of means.

16 Q. So -- and maybe that's a better place to
17 start. Other than the cure process, which you've just
18 described, what other responsibilities does the tax
19 assessor have related to the S.B. 14 responsibilities?

20 And maybe the answer is none, but I
21 assume you know more about your business than I do.

22 A. Sure. I mean, anything that we had to
23 implement was isolated to it being related to the cure
24 process.

For example, if we had to include the

1 letter "E" on a voter registration card, well, that was
2 related to the cure process, indicating that they were
3 exempt. So almost everything was related to the cure
4 process.

5 Q. Okay. We've heard testimony today, earlier
6 today from Mr. Stanart about a pre-match process that he
7 would do for poll workers where he would take the DPS
8 driver's license database and match it with the voter
9 registration database and try to determine matches so
10 that poll workers could more easily facilitate receiving
11 IDs.

12 I think that's more or less the gist of
13 the subject matter of his testimony on that subject. So
14 did you have anything to do with that on the pre-match
15 process?

16 A. Only insofar as he was matching it to the list
17 of registered voters, which he could have obtained
18 independently through our information database.

19 Or he could have asked for it, and I just
20 don't know if we gave him a list of voters. That would
21 be the extent of it.

22 Q. You wouldn't facilitate at all actually doing
23 such a match?

24 A. No, sir.

25 Q. Okay. Now, of course, I want to come back to

1 the cure process, but your office also processes the
2 provisional ballots affidavits after an election; is
3 that right?

4 A. Yes.

5 Q. And your clerks review the affidavits, and
6 then there's boxes on the form for them to check for
7 various inquiries that they make; is that right?

8 A. Yes.

9 Q. And we have in the records that Harris County
10 produced some provisional ballots that relate to a
11 person not having an ID, or complying with S.B. 14.

12 Have you seen any of those at any time?

13 A. Yes, I would have seen a provisional ballot.

14 Are we talking about the November election?

15 Q. I'm not really sure, I just saw them in the
16 box.

17 A. Sure. Most every election since S.B. 14, I
18 would have seen at some point.

19 Q. Okay. And you would have seen them in real
20 time? In other words, when a clerk say, "Oh, this is an
21 S.B. 14," she or he was trained to go take it to you?

22 A. No.

23 Q. Okay.

24 A. We have separate bins for unique problems that
25 correspond to the provisional ballot affidavit that we

1 review. So, yes, there was a bin for provisional ID,
2 for lack of a better word, ballots.

3 And our job was to match up the cures
4 with those provisionals. So it would have been at that
5 time when pairing the cures with those provisional
6 ballots that I would have had some interaction with
7 them.

8 Q. I see. Okay. And cures are when people come
9 in and they show their ID, and now they are eligible to
10 have their provisional ballot tabulated; is that right?

11 A. Yes.

12 Q. Okay. On people who come in and have to cast
13 a provisional ballot, and they don't come back and cure,
14 and the ballot affidavit references that it's an
15 ID-related issue, what does your office do with those?

16 A. Okay. They are held until after the cure
17 period is over. We would not want to release them until
18 they had an opportunity to cure their vote.

19 So those are generally going to be the
20 last provisional ballots that we send back up because we
21 have to wait until the voter has the opportunity,
22 full-time frame to cure their vote.

23 Q. Would you -- did your office do anything to
24 sort of contact those voters and help them work out
25 their ID issue?

1 A. No, sir.

2 Q. Were those names reported to anybody, as far
3 as you know, whether it's the United States, or Texas,
4 or some private group?

5 A. No, sir. Not unless there was an open records
6 request, and there may have been a few, but the county
7 clerk's office received those.

8 Q. Okay. There is some inclination that a
9 Houston group called King Street Patriots has at times
10 been involved with your office on voter registration.
11 Have you ever experienced any of that?

12 A. No, I have not.

13 Q. So you don't ever interact with anybody from
14 that group?

15 A. Honestly, no. I don't -- I interact with
16 people through our volunteer deputy registration
17 trainings, and we may have a training out there, and I
18 may have interacted with them in that sense.

19 I've never been to their location, I
20 don't even know who the members are. But I can't say
21 that I haven't, if I don't know.

22 Q. Sure. Well -- and that's fair enough. I
23 guess, you know, I just want to --

24 A. No one -- I've never interacted with any known
25 person from King Street Patriots --

1 Q. Okay.

2 A. -- in the context of voter registration.

3 Q. When you would process these provisional
4 ballot affidavits after each of these elections in late
5 2013 and the ones that have happened this year, were
6 there any poll watchers or observers present in the tax
7 office?

8 A. No.

9 Q. All right. Now, you mentioned the training
10 you did for your staff. Were there any materials that
11 you created as part of that training?

12 A. Yes.

13 Q. I assume you've produced those in response to
14 the subpoena.

15 A. I have not.

16 Q. Okay.

17 A. It is identical to the secretary of state's
18 training.

19 Q. I see. All right. So which is going to be my
20 next question. You didn't go out and recreate the
21 wheel, you used what the secretary of state sent?

22 A. Yes, but we did have some additional slides
23 that dealt with procedure. So if you want those, I can
24 produce those.

25 Q. Slides as, like, part of a Power Point?

1 A. Yes, sir.

2 Q. Okay. Yeah, I would like that. And we're
3 going to send a letter to your counsel for those things
4 so you don't have to try to keep track of it now.

5 A. Okay. Yes.

6 Q. When you would do these trainings, there was
7 like a Power Point that you went through, is that what I
8 understand?

9 A. Yes. It evolved. When it first came out that
10 this would be in effect, we huddled up with voters and
11 went over the basics. At that time, we just had basic
12 information, but statutes and administrative code
13 provisions.

14 So, you know, once there was more
15 training materials by the secretary of state, we
16 utilized those. So it evolved.

17 Q. And some of those items you created, some of
18 them you got from the secretary of state?

19 A. Yes, sir.

20 Q. Was there any items or activities that your
21 office had to spend money on in order to implement
22 S.B. 14?

23 A. Not specifically. Everything was included or
24 absorbed through our regular expenses.

25 Q. Okay. All right. Now, I want to talk

1 briefly, I understand that there's an issue on Senate
2 Bill 14 as it relates to substantially similar names,
3 where poll workers have to determine whether an ID is
4 substantially similar to the voter registration
5 information.

6 A. Yes.

7 Q. And I recognize that's not your area; correct,
8 that's not something you deal with?

9 A. Yes.

10 Q. You're not a poll worker, in other words?

11 A. Correct.

12 Q. All right. But obviously, how your office
13 enters voter registration applications could play into
14 this, so I want to ask you a little bit about that,
15 okay?

16 A. Sure.

17 Q. As I understand it, I'm trying to save us time
18 here, so correct me if I'm wrong. As I understand it,
19 you get a voter registration from many sources, you have
20 a clerk there, the clerk will sit down and enter that
21 information into the system, to the extent they can read
22 the handwriting.

23 A. Yes, sir.

24 Q. And the information is uploaded to the state,
25 cross-referenced with the state database, and it comes

1 back, and people are either registered or sent notices.

2 Is that the basic process?

3 A. Generally, yes.

4 Q. Okay. Do you know if there are limiting
5 characteristics in the computer system utilized by voter
6 registration clerks on how they can input a name?

7 A. Limiting characteristics?

8 Q. So I can give you an example if that doesn't
9 make sense to you.

10 A. Go ahead.

11 Q. Okay. So let's say you had Jose de Santiago.
12 Does the system restrict the person to entering
13 "de Santiago" with spaces in between the "de Santiago,"
14 or keeping it together as one word?

15 A. No, if there's a space between the D-E and the
16 Santiago, then we include that space, if that's what
17 you're asking.

18 Q. Okay. And when that information is sent up to
19 TEAM in the secretary of state's database, do you know
20 whether or not their software has a limiting restriction
21 as to how you would enter that name?

22 A. I'm not aware.

23 Q. You don't know one way or the other?

24 A. No.

25 Q. It could be the case, and we don't know, that

1 the state system might require there to be a space
2 there, and the county system somebody chooses to enter
3 it in adjacent letters; is that true, that could be the
4 case?

5 A. I think -- I think they're matching it up with
6 a name that they have, so it would be dependent on how
7 the name appears and whatever record they're looking at.

8 Q. Right. I guess that's my point. If there is
9 not -- if there is not a requirement in the software as
10 to how you enter your name, then different people may do
11 it different ways.

12 So "De la Cruz" might end up with two
13 spaces with somebody -- on person in your office. A
14 different person in your office gets the same
15 application, they may have put no spaces in there; is
16 that right?

17 A. That different people may put different names
18 on applications with a space or without a space?

19 Q. Well, stated a little bit differently,
20 different people in your office may input the same name
21 differently.

22 A. That's possible.

23 Q. Okay.

24 A. Depending on how it appears on the
25 application.

1 Q. And similarly, whoever over at DPS, for
2 example, enrolls a name, the same name when they go get
3 their driver's license, or their EIC, may enter it in a
4 different way than the voter registration clerk entered
5 their voter registration application; is that right?

6 A. I can't speak to that, but it's possible.

7 Q. Okay. So are you aware of any controls in
8 your office, or like guidelines, or things that you
9 instruct your clerks to do in terms of dealing with
10 different names?

11 A. They input the names as it appears on the
12 application. So if it appears as though there's a space
13 between the names in the last name, then they will
14 include a space.

15 Q. I see. Okay. And if they -- do the people in
16 your office have the ability to go on the statewide
17 database and look up a name when they're enrolling a
18 voter registration application?

19 A. Yes, they can access a DPS database.

20 Q. Okay.

21 A. It's limited to that.

22 Q. And do they do that as a matter of course when
23 they're processing voter registration applications?

24 A. Yes.

25 Q. So, in theory, if someone is doing their job,

1 they are looking at a voter application and they will
2 see "De la Cruz" with spaces, they're supposed to go on
3 the driver's license database and make sure that's how
4 it's entered there as well?

5 A. If they have a question as to whether there's
6 a space or not, then they should use that database and
7 say, "Okay, this person, there is a space in the DPS
8 record, let's err on the side of interpreting it as
9 there being a space."

10 Q. Okay. But some of them may not question it,
11 it may look clear to them. And then what you're saying
12 is some of them may not look at the DPS database.

13 A. It would be incumbent on their discretion to
14 access that database or not.

15 Q. All right. So when the report's made to do
16 the match to the secretary of state, is that done
17 nightly or weekly?

18 A. I believe it's nightly.

19 Q. Okay. So when that is sent in nightly and a
20 report comes back the next day, there's going to be a
21 report of non-matches; is that right?

22 A. Yes.

23 Q. And what's done with that report in your
24 office, if anything?

25 A. We have a processor review those.

1 Q. And what does that person do?

2 A. Well, they research the accounts, they see if
3 it was potentially a typo and data entry error on our
4 part. And if that's the case, then we cure it, and we
5 send it back up, and it could get resolved that way.

6 Q. So let's say "De la Cruz" comes back and it
7 was Anthony De la Cruz, and it comes back and it says,
8 "no match," it's not going to say on there, is it -- or
9 maybe it will, but we have a Tony De la Cruz with no
10 spaces in the driver's license database, maybe that's
11 what you mean? I mean, does it make suggestions to you
12 like that in the match?

13 A. No, it does indicate the name and information
14 as it appears in their records. We have two separate
15 names and identifiers.

16 One that was ours that we sent, and one
17 that was theirs. That's the only information that's on
18 those reports.

19 Q. So then it would be up to your office -- when
20 Anthony De la Cruz comes back as a non-match, it would
21 be up to somebody in your office then to get into DPS's
22 database and maybe search "De la Cruz" with and without
23 spaces, maybe search "Tony," in order to find out if
24 there was an entry that should have been a match, the
25 computer just didn't catch it?

1 A. Yes.

2 Q. And does that happen?

3 A. Do we make typo mistakes?

4 Q. Well, do you do this review that we've just
5 described?

6 A. Yes. We review each and every one of them.

7 And to see what the issue is, we attempt to identify the
8 issue. If it's something we can cure on our end, then
9 we do that.

10 If it's not, then they are sent a letter
11 that indicates they need to submit a new application.

12 Q. So when you say if it can be cured on your
13 end, in my example, it would mean just sending it back
14 up to the state but this time without spaces?

15 A. Yes, yes.

16 Q. Okay. And your office would do that?

17 A. Yes, sir.

18 Q. If somebody is sent in -- you know, again,
19 let's say it's Anthony De la Cruz, has submitted a voter
20 registration to the state, and it comes back as a
21 non-match, and somebody in your office works it like
22 they're supposed to, and they can't find anything else,
23 any other entry in the state database that it should
24 match, then what happens?

25 A. They're sent a letter indicating that they

1 need to submit a new application within ten days.

2 Q. So what if they're a new resident of the state
3 so they're not in the statewide database, and they're
4 not supposed to be yet?

5 A. I don't think they would necessarily fail that
6 check.

7 Q. Okay.

8 A. Honestly, my knowledge of this process is
9 limited.

10 Q. That's fair.

11 A. Especially since there's that other component
12 of the state.

13 Q. Yeah. And if we ask you anything you don't
14 know, you know, that's completely fair. I'm not trying
15 to get you to guess about things.

16 All right. I assume your office doesn't
17 have anything to do with issuing Senate Bill 14 related
18 or eligible IDs.

19 A. Issuing eligible IDs, no, we have nothing to
20 do with issuing IDs.

21 Q. Okay. You can't, as I understand it, even
22 issue underlying documentation for IDs, like birth
23 certificates?

24 A. We can issue a voter registration card. I
25 believe that's a second form of ID to get certain forms

1 of ID.

2 Q. Okay. Any other documents that you think are
3 underlying IDs?

4 A. We have tax records, auto records. There's a
5 long list of things that are secondary forms of ID, so
6 maybe a tax statement would help.

7 Q. Are you aware of anybody coming to the tax
8 office and requesting these secondary items in order to
9 obtain an ID?

10 A. That's a common request, requesting voter
11 registration certificates as a form of ID.

12 Q. Okay.

13 A. It's a common request.

14 Q. Well, I guess what I'm asking is a little more
15 specific question. Are you aware of a specific, you
16 know, incident or group of incidents where somebody has
17 come in and said, "I need this because I need to get an
18 EIC or driver's license so I can vote"?

19 A. No, I can't think of any specific individual
20 that I'm aware of. I can only -- I would just be
21 guessing whether somebody would request it for that
22 purpose or not. We wouldn't know why they were
23 requesting it.

24 So it goes against the nature of this
25 type of request. We can't say, "Well, why do you want

1 this?"

2 Q. Sure. Are you aware at your time there at the
3 tax office that -- and I understand this might be more a
4 county clerk office issue, but are you aware in the tax
5 office of anybody trying to commit voter fraud?

6 A. Anyone trying to commit voter fraud?

7 Q. Yes.

8 A. I just got a request dealing with some voter
9 fraud allegations back in 2010. So I don't have any
10 personal knowledge of that, but it seems as though back
11 in 2010, there were some allegations of fraud.

12 Q. And what was -- from whom did this request
13 come?

14 A. This came from a media source.

15 Q. Okay. And what is the incident that's
16 referenced?

17 A. They asked for voter fraud allegations related
18 to Houston votes. And there was some larger entity they
19 said they were part of, Houston Education, some other
20 larger entity. I know nothing about the fraud
21 allegations.

22 Q. Any other incidents that you're aware of?

23 A. Voter fraud?

24 Q. Yes.

25 A. In terms of registration?

1 Q. Yes.

2 A. No. As a matter of just routine, we issue a
3 report to the DA's office after each election, it's a
4 poll book audit. And that is a listing of voters who,
5 you know, were not on the poll book but voted, that sort
6 of thing, that were canceled and yet still voted. And
7 so that's the only possible potential, and that goes to
8 the DA's office.

9 Q. Are you aware of any prosecutions by the
10 Harris County DA's office on voter fraud?

11 A. No. I know they do research sometimes, but
12 I'm not aware of any prosecutions.

13 Q. I think that's my questions for today. One of
14 these other lawyers may have some questions. Thank you
15 for your time.

16 A. Thanks.

17 MR. SCOTT: Angela, you want to go?
18 MS. MILLER: Yes, I could. I just have a
19 couple of quick questions.

20 EXAMINATION

21 BY MS. MILLER (via telephone):

22 Q. So, Mr. Harris, you were talking about the
23 cure process. How are people who cast provisional
24 ballots informed about the cure process and the cure
25 period?

1 A. Okay. When they vote provisionally, they're
2 given a provisional affidavit. And on that form, it has
3 a notice to provisional voter.

4 It informs them that they have that
5 six-day period to come cure their vote. There is a map
6 that's not only on the provisional ballot itself, but
7 there's a separate map that has all of the tax office
8 locations, and the information is all on that notice.

9 Q. And that six days, is it clarified on that
10 notice whether that's business days or calendar days?

11 A. I would have to look at the notice. It's
12 prescribed by the secretary of state.

13 Q. So the notice -- does the secretary of state
14 give you a form notice that you use?

15 A. This is the county clerk's materials.

16 Q. Okay.

17 A. So at the time of voting, they're handed this
18 when they vote provisionally. This is something that
19 every provisional voter is given.

20 Q. But is this notice something that the county
21 developed, or is it the secretary of state giving you a
22 notice that you use?

23 A. Yeah, they prescribe the language.

24 Q. Okay.

25 A. And we put it on our -- each county does it

1 differently in terms of the types of affidavits, the
2 size of the paper, the layout. So that language would
3 have come from the secretary of state.

4 Q. And how do they send that language to you? Is
5 it in an e-mail, or how do you receive it?

6 A. You know, I'm kind of speaking outside my
7 domain. This would be between the county clerk and the
8 secretary of state's office.

9 Q. Okay.

10 A. And I just can't speak to that.

11 Q. Got it, okay. And the disability exemption
12 for folks who have a reported disability and are exempt
13 for the ID requirements of S.B. 14 --

14 A. Yes.

15 Q. -- does your office have any involvement in
16 implementing that disability exemption?

17 A. Yes. We accept the form and we process it,
18 and we would indicate on their voter registration
19 certificate they have that exemption. And we also would
20 indicate it on the poll book, if we produced a poll book
21 for a smaller entity.

22 Q. And did your office do any outreach to inform
23 voters that this exemption exists?

24 A. Yes.

25 Q. What sort of outreach have you done?

1 A. Several press releases. I consulted with our
2 communication director, our manager, and asked him, you
3 know, "How many media sources picked up what we've sent
4 out," and he told me that there were 44 media
5 impressions.

6 That varies from on-line, to radio, to
7 e-mail blasts by non-profits. So through press
8 releases, I guess the normal traditional sense, social
9 media.

10 We did communicate with -- well, first,
11 we created posters that were based on the secretary of
12 state's eight-and-a-half by 11 handouts describing the
13 seven forms of ID and the exemptions.

14 So we made large posters of those and put
15 those up at all of our branches. And we also e-mailed
16 those posters out to certain people.

17 For instance, you know, the Coalition for
18 the Homeless, and they were able to integrate that into
19 one of their newsletters, I believe.

20 Q. Any other groups or agencies that you e-mailed
21 them to, or distributed them to?

22 A. Well, we worked with 211, which is our local
23 call center where people who have questions can call
24 that number and get answers.

25 We anticipated maybe people would call

1 211 asking these type of questions. We wanted them to
2 be informed and educated, so we worked with them,
3 trained 30 or 40 of their call center staff.

4 Q. And is that 211 line, what sort of -- is that
5 a city line, or a county line?

6 A. Yes, it's some sort of non-profit, United
7 Way/City of Houston. I don't know exactly who owns it,
8 or how it's funded.

9 Q. Okay. What sort of queries are usually made
10 to 211?

11 A. Oh, boy.

12 Q. I mean, if people are told to call 211, what
13 for?

14 A. People -- we never instructed anyone to call
15 211. However, we anticipated people may call that
16 number and ask these type of questions. I think it's
17 just -

18 Q. How do people know to call 211 for anything?

19 A. They have their own marketing campaigns.

20 Q. Okay. And do you know in those campaigns why
21 they suggest calling 211?

22 A. Oh, again, I don't know exactly what types of
23 calls they were designed to accept, but I know that they
24 accept a wide variety of phone calls, you know, just
25 general citizen-to-government type questions.

1 Q. Okay.

2 A. People that need help. And they're able to
3 direct them to the proper source, you know. "How do I
4 get a special Metro bus to come pick me up?" 211 can
5 put them in touch with Metro, or can help put them in
6 touch with the proper -- they're kind of triage for
7 people in need of services.

8 Q. So addition -- in addition to Coalition for
9 the Homeless and 211, were there any other agencies,
10 organizations, or kind of groups that you tried to
11 disseminate information through?

12 A. Sure. By nature of our vehicle registration
13 work, we work with grocery stores and other
14 subcontractors who handle voter registration. We
15 e-mailed some materials to them and asked that they post
16 those.

17 I don't know if they did or not, but
18 we -- in terms of outreach, we reached out to them to
19 spread the word.

20 Q. Anything else?

21 A. You know, I participated in a conference call
22 with the county attorney's office and the county clerk's
23 office with election workers. That's about the extent
24 of it.

25 Q. Did you guys try to disseminate information

1 through Social Security offices?

2 A. No, ma'am.

3 Q. What about DHHS or any of its sort of
4 subsidiary organizations?

5 MR. RAY: Well, I want to point out to
6 you, I don't think Mr. Harris realized this, but 211 is
7 actually run by the Texas Health and Human Services
8 Commission.

9 MS. MILLER: Okay.

10 MR. RAY: So the 211 line is -- you know,
11 use of that line actually would be using the Health and
12 Human Services network of all their various services, if
13 somebody were to call that number.

14 Q. (By Ms. Miller) Okay. Any other -- any other
15 outreach that you did with any subsidiary of DHHS, other
16 than the 211 line?

17 A. No, no specific outreach.

18 MS. MILLER: I think that's all the
19 questions I have. Thank you.

20 EXAMINATION

21 BY MR. SCOTT:

22 Q. Mr. Harris, my name is John Scott. I
23 represent the Texas defendants in this litigation. A
24 couple of real quick housekeeping things. Documents,
25 you didn't bring any documents with you today; is that

1 correct?

2 A. That's correct.

3 Q. Have you provided any documents before today,
4 either to your counsel, or to Mr. Dunn, or to the
5 Department of Justice, or anybody else associated with
6 this case?

7 A. No, sir.

8 Q. With regard to you mentioned requests pursuant
9 to the -- I don't know that you used this terminology,
10 but the Public Information Act?

11 A. Yes.

12 Q. Do you recall any document request pursuant to
13 the Public Information Act that have come into your
14 office for documents similar to those that had been --
15 were in the deposition notice that you were asked to
16 bring? Here is a copy for you to review.

17 A. So you're asking if the Harris County tax
18 office received any open records request associated with
19 any of these documents?

20 Q. Yes, sir.

21 A. The answer is yes.

22 Q. Which categories, as you recall?

23 A. Sure. Dealing with the provisional ballots.
24 We received a request from some organization out west in
25 Texas, maybe El Paso or so, and they wanted, basically,

1 copies of provisional ballots. And we directed them to
2 the county clerk's office since we're not the custodian
3 of those records.

4 Q. Have you filed any requests from a John Powers
5 at Department of Justice?

6 A. No.

7 Q. Do you recall visiting with anyone else with
8 the Department of Justice on document requests?

9 A. No, sir.

10 Q. Okay. How about anybody over at Rice
11 University, has anyone -- have you been in touch -- has
12 anyone from Rice University's political science
13 department been in touch with you?

14 A. Not that I'm aware of, no.

15 Q. Okay. Is there -- Mr. Dunn asked you what
16 race you were. Is there anything about your race that
17 has anything to do with how you do your job?

18 A. No.

19 Q. Does it come into play in any role? Does race
20 come into play in any role in doing your job?

21 A. No.

22 Q. You answered some questions relating to the
23 process to cure provisional votes, and the role that you
24 play in that process.

25 Help me understand that a little bit

1 better. When a provisional ballot is cast at the
2 polling place by an effected voter, does -- who retains
3 custody of that ballot for the next six days during that
4 cure period?

5 A. Once we're in possession of it, we keep it
6 until the end of the cure period.

7 Q. Okay. And then what do you do with it?

8 A. We remit it back to the county clerk's office.

9 Q. So if a -- in the case of a voter ID issue, if
10 someone cures by bringing an acceptable form of photo
11 ID --

12 A. Yes.

13 Q. -- and shows that, do y'all forward the copy
14 of the photo ID? How does that process work at that
15 point in time?

16 A. We do not -- it's similar to when the person
17 votes. We do not make a photocopy of anything. We
18 simply make a notation, and include that, and check the
19 box that they came in to show -- there's three ways they
20 can cure their vote. Through a permanent exemption, a
21 temporary exemption, or by showing a valid ID. We check
22 the appropriate box.

23 And if it's one of those temporary
24 exemptions, we would have included the associating
25 documents. So we simply check a box on the provisional

1 affidavit.

2 Q. And once the correct box is checked, does that
3 end the cure period for that ballot, and so thereby, you
4 forward that immediately over to the county clerk?

5 A. Yes, sir. As soon as they cure their vote,
6 there is no need to retain it for the six-day period.

7 Q. And it's forwarded on and they do with it
8 whatever they're going to do?

9 A. Yes.

10 Q. Okay. You were asked some questions about
11 deputy registrar training. First of all, what is a
12 deputy registrar?

13 A. These are volunteer deputy registrars in the
14 State of Texas. Anyone who qualifies can be appointed
15 by our office to accept voter registrations and turn
16 them into our office.

17 Q. And what are the qualifications to become a
18 volunteer deputy registrar?

19 A. Okay. I may omit a qualification or two, but
20 generally speaking, you have to be 18 years of age,
21 cannot be convicted of an ID fraud felony. It's very
22 nominal qualifications. I think similar mental health
23 rules as in the ability to vote.

24 You cannot be discharged by a court of
25 being not mentally sane, and you have to attend a

1 volunteer deputy training course.

2 Q. Is that course put on by your office here in
3 Harris County?

4 A. Yes, sir.

5 Q. Or is it put on by someone else?

6 A. We host, and we teach and train the course.

7 Q. And do they sign off on when they complete
8 their study? How do you keep track of who's completed
9 and who hasn't?

10 A. Sure.

11 Q. I guess that's a better way to ask.

12 A. It's as simple as a sign-in sheet.

13 Q. Okay. And when a volunteer deputy registrar
14 goes out and signs people up, is there a way to track
15 who they have signed up through y'all's process?

16 A. Each volunteer deputy has a unique number
17 that's associated with the form that they -- the
18 application that they submit to us.

19 So, yes, we can -- we can identify an
20 application we've received and associate it with the
21 particular volunteer that turned it in.

22 Q. So when there's a no-match list, we talked
23 about that a little bit in your deposition, the people
24 who at least on the surface do not appear to have a
25 photo ID that's matched up to a registrar, a person

1 who's registered to vote. So for purposes of our
2 deposition, you understand a no match to be that; is
3 that correct?

4 A. This is -- by no match you mean that the
5 official list of registered voters has been matched with
6 DPS lists, or what?

7 Q. Well, let's limit it at that level.

8 A. Okay.

9 Q. Because that's what -- a number that I think
10 the county clerk comes up with is soft matches.

11 A. Okay.

12 Q. People who do not match up identically between
13 the registrar roles and the DPS data.

14 A. Okay.

15 Q. So of those people, each one of those persons
16 will have a unique ID number attached to a deputy
17 volunteer registrar, if they were signed up by one?

18 A. No, I think I've omitted a major, major
19 fundamental principle here.

20 Q. Okay.

21 A. That these volunteers are in addition to how
22 we receive applications through mail and otherwise.

23 Q. Okay.

24 A. So while they do turn in a substantial amount
25 of applications, not every application is associated

1 with a volunteer deputy.

2 Q. Percentage-wise, in Harris County, as we sit
3 here today, what percent of the registered voters would
4 you estimate are the result of volunteer deputy
5 registrar activity?

6 A. I cannot answer that for fear that I would not
7 accurately give you a picture.

8 Q. Okay.

9 A. I can tell you that we have over 5,000
10 volunteer deputies out there.

11 Q. But if it came -- so if we're trying to go
12 back and track and figure out who was signed up by a
13 volunteer deputy registrar --

14 A. Yes.

15 Q. -- there would be a connection with that
16 voter's information, that would identify a unique number
17 and, thereby, the fact that it has a unique number it
18 would be connected to a sign-up by a volunteer deputy
19 registrar; correct?

20 A. Yes, sir, yes.

21 Q. Okay. During the training of the deputy
22 registrars, the volunteer deputy registrars, are they
23 cautioned about attempting to sign people up who are
24 registered to vote in other states?

25 A. Are they cautioned to not register people who

1 are registered in other states?

2 Q. Sure.

3 A. We follow a strict Power Point provided by the
4 secretary of state. I don't believe that's specifically
5 mentioned in the Power Point. So --

6 Q. In order for someone to be registered to vote
7 in Texas, they have to consider themselves domiciled in
8 the State of Texas for a period of time, 30 days; is
9 that correct?

10 A. For voting purposes?

11 Q. Yes.

12 A. No, I believe they have to --

13 Q. Is it 60?

14 A. No, sir. I believe they have to submit an
15 application, or they attest to the fact they reside at
16 the address provided.

17 Q. And residency requirements in order to be able
18 to register to vote in Texas, in Harris County, are
19 what?

20 A. Oh, well, I mean, registration is effective
21 after 30 days.

22 Q. Okay.

23 A. So 30 days after the application, it becomes
24 effective. So in that sense, if that's --

25 Q. Are you aware of situations where deputy

1 volunteer -- or volunteer deputy registrars are
2 attempting to sign up people who consider themselves
3 residents of other states?

4 A. Am I aware of any volunteer deputies who are
5 attempting to register people in other states?

6 Q. No. Who are registered to vote in other
7 states who consider themselves a resident of those other
8 states.

9 A. I'm not personally aware of that.

10 Q. The database that's used for purposes of the
11 Harris County elections, that is the one that you are in
12 charge of; correct, of registered voters?

13 A. Yes.

14 Q. The TEAM database is information that's
15 uploaded from Harris County to TEAM -- to the secretary
16 of state, but you don't actually use the TEAM database
17 for purposes of implementing the elections; correct?

18 A. Correct.

19 Q. So Mr. Dunn asked you some questions about
20 potential differences in names and spaces in the last
21 names. Do you recall those questions?

22 A. Yes.

23 Q. With regard to for purposes of implementing an
24 election, for purposes of trying to determine who is not
25 a correct match, the best source of that database would

1 be your database that you use to implement the
2 elections; correct?

3 A. Well, we are one piece of information, the
4 official list of registered voters.

5 Q. And it is the only official list; correct?

6 A. Correct.

7 Q. The TEAM database simply attempts to copy that
8 database, is your understanding; correct?

9 A. Correct. Now, we're an off-line county. I
10 don't know if that factors into what you're saying or
11 not. Other counties are on-line, and I can't speak to
12 how they operate.

13 Q. We're speaking of your county.

14 A. Yes.

15 Q. Harris County.

16 A. Yes.

17 MR. SCOTT: That's all the questions I
18 have for you. Thank you for your time, sir.

19 FURTHER EXAMINATION

20 BY MR. DUNN:

21 Q. Well, just to follow up, what did you mean by
22 off-line versus on-line counties?

23 A. Some counties, I believe, instead of using
24 their own internal database, they rely on the state.
25 They upload and enter all their information to the TEAM

1 system, and that is their database for that county.

2 Because of the volume, that's just simply not possible
3 here in Harris County.

4 Q. So is another way of saying that, in some
5 counties, the county voter registrar's office input and
6 work directly out of TEAM, whereas in Harris County, you
7 use a different software, and then it's, you know,
8 meshed with TEAM?

9 A. Then they may maintain their records through
10 the TEAM system, if that's -- but again, I can't speak
11 to how other counties do it.

12 MR. DUNN: Sure. All right. Thank you
13 very much.

14 MR. RAY: I guess we're done.

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1 CHANGES AND SIGNATURE

FOR THE DEPOSITION OF J.R. HARRIS

2 JUNE 17, 2014

3 PAGE LINE CHANGE REASON

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1 I, J.R. HARRIS, have read the foregoing
2 deposition and hereby affix my signature that same is
3 true and correct, except as noted above.

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J.R. HARRIS

8

9 THE STATE OF _____)

10 COUNTY OF _____)

11 Before me, _____, on
this day personally appeared J.R. HARRIS, known to me or
12 proved to me under oath or through _____
(description of identity card or other document) to be
13 the person whose name is subscribed to the foregoing
instrument and acknowledged to me that they executed the
14 same for the purposes and consideration therein
expressed.

15

Given under my hand and seal of office
16 this _____ day of _____, 2014.

17

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19

NOTARY PUBLIC IN AND FOR

THE STATE OF _____

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1 REPORTER'S CERTIFICATION

2 DEPOSITION OF J.R. HARRIS

3 JUNE 17, 2014

4 I, Cynthia C. Miller, a Certified Shorthand
5 Reporter in and for the State of Texas, do hereby
6 certify that the facts as stated by me in the caption
7 hereto are true, that the above and foregoing answers of
8 the witness, J.R. HARRIS, to the questions as indicated
9 were made before me by the said witness after being
10 first duly sworn to testify to the truth, and same were
11 reduced to writing under my direction; that the above
12 and foregoing deposition as set forth in writing is a
13 full, true and correct transcript of the proceedings had
14 at the time of taking said deposition; that as requested
15 the deposition was made available for the witness to
read and sign.

16 I further certify that I am not, in any
17 capacity, a regular employee of the party in whose
18 behalf this deposition is taken, nor in the regular
19 employ of their attorney, and that I am not interested
20 in the cause, nor of kin or counsel to either of the
21 parties.

22

23

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2 GIVEN under my hand and seal of office on
3 this, the 9th day of July, A. D. 2014.

4

5

6

7

CYNTHIA C. MILLER, Texas CSR 8065

8 Certification Expiration 12/31/2014

9 Firm Registration No. 378

9 P.O. Box 169

10 Tomball, Texas 77377

10 281.376.9303

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